

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
Pro Se Non-Prisoner Complaint Form

RECEIVED
USDC CLERK, GREENVILLE, SC
2013 JUN 26 P 12:26

[Enter the full name of the plaintiff in this action]

Civil Action No. _____

Lisa Lou Ann Thomas (to be assigned by Clerk)

v. _____

[Enter the full name of each defendant in this action. If possible, please list only one defendant per line.]

NHC Mauldin

Deborah Dobson administrator

Linda Knight human resources

their atty Clark McCant III
of Tennessee

If allowed by statute, do you wish to have a trial by jury? Yes ☒ No ☐

[If any answer requires additional space, please use additional paper and attach hereto.]

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ☒ No ☐

B. If your answer to A is Yes, describe the lawsuit in the space below. [If more than one lawsuit, describe on another sheet of paper using the same outline.]

1. Parties to this previous lawsuit:

Plaintiff: Lisa Lou Ann Thomas

Defendant(s): NHC Mauldin

2. Court: Workers compensation Johnnie Fellers

(If federal court, name the district; if state court, name the county)

3. Docket Number: _____
4. Name(s) of Judge(s) to whom case was assigned: _____
5. Status of Case: _____
(For example, was the case dismissed? Settled? Appealed? Still Pending?)
6. Date lawsuit was filed: _____
7. Date of disposition (if concluded): _____
- C. Do you have any other lawsuit(s) pending in the federal court in South Carolina?
- Yes _____ No ☒

II. PARTIES

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

- A. Name of Plaintiff: Lisa Lou Ann Thomas
- Address: 512 Old Mill Rd. Mauldin SC 29662

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

- B. Name of Defendant: NHC Mauldin Deborah Dobson Linda Knight
(administration) (human resources)
- Address: _____

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Tiffany - in activities unit 2 ^(person 2) mistreatment cruel and aggravated nature.

Deborah Dobson (administration) Informed me in May 24th 2012 not to come back to work unless I could walk

Linda Knight (human resources - along w/ Tiffany) ^(person 1) in activities mistreatment towards me cruel and aggravated nature

III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case: Describe how each defendant is involved.

Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

4/10/12

#1 st Confidentiality broken between myself the patient and the company doctor when my 2nd checkup pertaining to the incident. (1st visit w/ worker's comp dr.) I was in the human resources office w/ the hr. rep. Linda Knight. Linda hovered over Jarouel as Dr. Sherman asked me questions. Linda Knight was trying to speak for me and put words in my mouth about how I was feeling. She did this on several occasions.

4/17/12 #2 Mistreated by nursing staff @ the initial accident
Janice was the Charge Nurse on unit 3 that day as Kathy / Cathy was second in charge. Janice advised Cathy to send me to St Francis @ Patwood. I would later find out by Linda Knight that I was supposed to had been going for treatment using Hillcrest Hospital. This was on April 29, 2012. Also I wasn't given my right to file my part for the incident report. I finally gave testimony of the accident on March 2013 @ a deposition for my worker's compensation. Which I have yet to have obtained to present day.

#3 4/24/12 Deborah Dobson has Linda Knight pull me into her office and accused me of not having anything wrong w/ me. Drs. prescribed me the meds I was on (Cortab, Oxycodone, morphine) because they saw the pain I was in. Deborah Dobson didn't want me there. She didn't care about my pain. The medicine made me druggie. I couldn't help it.

#4 4/24/12 I was fired and rehired all in one day by Deborah Dobson. After Deborah told

III. STATEMENT OF CLAIM - continued.

action @ NHC Mauldin

(Cont.) Linda so put me out in the hall and call my husband, 30 minutes passed before he came. While I was waiting Linda Knight told me to call in every day until I am done taking the medication. I stated to Linda "You were there when Deborah just fired me." I knew she did you heard her Linda Knight said so.

@ NHC in Mauldin

(5) Linda Knight called my house around mid-May 2014 accusing me of making other co-workers feel uncomfortable so taking me to the bathroom and she / administration didn't assign anyone to help. Several of the women who helped me: Christina, Jackie (activities special care unit 2 of the CNAs that worked outside of the special care unit and 1 nurse told me personally that they didn't mind helping.

(6) At NHC in Mauldin

5/12 TiLany activities coordinator / manager of unit 1, 2, & 3 activities departments, and Linda Knight verbally & emotionally ganged on me. As well as invaded my private space. The two of them had me in Linda Knight's office w/ the door closed and got down close in my face. I was very upset having to deal w/ this on top of my sustained injury. There were exchange looks between one another as if it were some type of setup. As if they were intentionally trying to intimidate me.

#6 At NAC in Mauldin

Also the prior Jackie Cactivities director on special care unit witnessed my being dragged into stand-up by Tiffany (manager/co-ordinator) against my will. I was emotionally distressed about all that was going on as well as being in pain.

#7 Several obvious signs of sarcasm, such as buying new wet floor signs that were the size of bows for 5yr old children. When the ones before were worn, not working flat. a NAC in Mauldin

Mid-May Linda Knight forced me to sign a new hand book after I'd already been injured twice.

#8 At NAC in Mauldin
I was falsely accused by Linda Knight of having a tape recorder and a blue tooth in my purse. Twice Linda Knight tried to look in my purse. She acted as if she was trying to put something in my purse, but she was really trying to search my purse.

#9 5/24/12 @ NAC in Mauldin

Deborah Dobson told me not to come back until I was able to walk. I, I didn't have to have my arm in a sling or my foot propped up on a trash can. This was what helped ease my pain. She didn't care.

At NAC in Mauldin

CNT

(96) Tiffany on unit 3L 1st shift was a witness to them (administration) not wanting to help me, to the bathroom. Tiffany even asked Linda Knight why are you all mistreating her like this?

Several of my co-workers told me to hang in there and keep my head up.

At NAC in Mauldin

The longer I tried to stay there a NAC and work under their light duty conditions the more unreal the treatment was. Certain members of the staff were told not to help me. They became very anti social towards me. (Activities directors/co-ordinators except Tim on unit 1 and Sackie on unit 3) Even Teresa the nurse in the back in special care, became very short w/me. Normally she was pretty kind and sweet.

I even saw evil come out of a nurse named Teresa (caucasian female). She never spoke to me before since I'd worked there. Her hair was bleached blonde & pigged short spiked to the front. She asked Lisa Heaton, "Where are you taking her?!?" She wants to go back to the laundry room. (This was moments after 2nd visit w/ Dr. Sherman in Linda Knight's office.

He decided to release me to Dr. Eison) Teresa told Lisa "NO!!!" You put her right back where she was now!!! And gave me a hateful look!

I was refused proper therapy
↓
(workers comp.)

(ordered
by Dr
Eison)

I was refused relocation from the
premises for therapy
↓
(workers comp.)

(ordered
by
Dr. Eison)

IV. RELIEF.

State briefly and exactly what you want this court to do for you:

I wish for the court to recover substantially financially for me for said allegations of mistreatment / racism, that were caused in part / whole by the defendants. As well as those additionally named in this compilation of sons. I do wish to be financially compensated for pain and suffering, wages lost. Quality of time / recreation that involved currency with my family, time lost from April 7, 2012 to this present day. Apprehension (forceful) undescribed / explained during action. Lucia Knight jerked on the wheelchair several times 5 times to be exact.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21 day of June, 20 13


Signature of Plaintiff Lisa Lou Ann Thomason